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FINAL MEETING MINUTES

Environmental Restoration Storage and Disposal Facility (ERSDF)
Ecology Kennewick Office; March 23, 1993; 9:45 - 11:30

1. DISTRIBUTION OF THE MARCH 10 MEETING MINUTES:

- Pamela Innis distributed the meeting minutes for the March 10, 1993 meeting for review and comment.

2. ACTION ITEM STATUS:

- No action items assigned at previous ERSDF meetings.

3. ACTION ITEMS ASSIGNED AT THIS MEETING:

ERSDF-1 Pamela Innis	Clarify the implication of "Risk Based Criteria" within the CAMU Rule.
ERSDF-2 Rich Hibbard	Evaluate the use of the W-5 trenches for ER generated mixed waste.
ERSDF-3 Moses Jaraysi	Draft a list of suggested items to go into the letter from RL as a response to the CAMU letter coming from the regulators.

4. REGULATORY FRAMEWORK FOR THE ERSDF:

- Dave Jansen and Paul Day are going to outline their preferred regulatory approach and fundamental need for treatment in a letter to Steve Wisness.
 - CAMU Request: A suggestion was offered as to how RL would provide information to support a request for a CAMU. It was suggested that RL provide a stand alone document which includes the history, rationale, and need for the facility, as well as the technical descriptions of design, operation, and closure/post-closure.
 - Treatment: Treatment of wastes will be considered in the CAMU designation.
- Pamela Innis stated that the letter from Paul Day and Dave Jansen described in the above paragraph has been prepared and is awaiting final signature. EPA and Ecology recommended that RL proceed with steps necessary to prepare a letter asking for site designation as a CAMU (see action item ERSDF-3).
- It was agreed that this "ERSDF Working Group" will make recommendations concerning the need for:
 - Modification of the Part B permit.



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- Preparation of RI/FS to reach a ROD for CERCLA application of CAMUs.
- Implications of the Part 3000-8(h) order.
- CAMUs and TUs.

5. RL CONCERNS:

- Jim Goodenough stated that RL has not adopted a formal position concerning the regulatory framework to be utilized for the ERSDF. It was stressed that options will be evaluated on the basis of: 1) consist 200 Area Land-Use decisions, 2) risk-based analyses, and 3) cost effectiveness. It should be noted that the new Assistant Secretary, Mr. Grumbly, will likely review the ER Programs at the national level.
- Jim Goodenough continued with details on cost effectiveness. At one end of the spectrum (the higher cost end) we have expectations for a disposal unit which involves RCRA MTR's + in-trench treatment technologies + the Hanford Barrier cap. The other end of the spectrum (the lower cost end) involves containment technology (ie, Hanford Barrier) + subsidence control treatment.

A 1000 year performance assessment will be prepared to allow for a comparison of the alternatives to determine if there are significant advantages in using the higher unit cost over the lower unit cost in terms of effectiveness of the containment or long term performance indicators. Unit cost efficiency is a critical parameter which needs to be understood by all parties involved as we continue the project planning stages of the ERSDF.

6. REGULATOR PRIORITIES:

- Remedial design options: Ecology noted that the technologies for cleanup of hazardous waste sites are listed in order of preference in WAC 173-340-360(4)(a). EPA noted that the remedy selection criteria are also noted in 40 CFR 300.430 (f).
- RCRA Equivalency: The regulator assumption is that any alternative design for the ERSDF will not meet RCRA equivalency. Ecology stated that the RCRA design would be the baseline design. Deviations from the RCRA design will be considered on a case by case basis and evaluated on:
 - The scientific merit of the proposed design.
 - The allowable flexibility within the regulatory framework.

Ecology and EPA expressed concern about the use of interim covers and expedient application of the final cover over the waste. Again, in order to deviate from the RCRA design, specifically the leachate collection system, the regulators must be assured that leachate will not develop during storm events or as a result of runoff.

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7. SCHEDULE, DESIGN, AND OTHER PRACTICAL ISSUES

- All parties agreed that:
 - The design of the facility should be flexible and expandable.
 - That a phased approach should be utilized for the design, operation, and closure.
 - That in the analytical area, "large-scale" remediation must be integrated with disposal needs, *i.e.*, waste characterization and waste acceptance criteria.
 - That the design and schedule must include evaluation and possible upgrade of site infrastructure such as transportation, possible need for a staging area, and/or interim storage.
 - That the impact of each requirement on the schedule must be evaluated.

8. PUBLIC INVOLVEMENT:

- Public involvement meetings: It was agreed that the baseline schedule for the ERSDF would be a good topic to present at the public involvement meetings. The next meeting is scheduled for the week of May 24th. Dennis Faulk will coordinate with other Public Involvement Officers to initiate development of a public involvement strategy. It is anticipated that the technical and regulatory teams will have enough information available to have the ERSDF as part of the public meeting. The Public Involvement leads were identified as:
 - Ecology: Temporarily unassigned.
 - EPA: Dennis Faulk
 - RL: John Yerxa
- Future Site Use Working Group: It was agreed that the Future Site Use Working Group would be a good forum to present the ERSDF concept.

9. INFORMATION ITEMS:

- Rich Hibbard announced that there had been a reorganization within the Department of Ecology that impacts personnel assigned to Hanford projects. Rich Hibbard is now working under the supervision of Toby Michelena rather than Larry Goldstein. Rich will still serve as Ecology's technical lead for the ERSDF.

LIST OF ACRONYMS UTILIZED IN THE DRAFT MINUTES

- CAMU/TU - Corrective Management Unit and Temporary Unit
- CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act
- EPA/HQ - U.S. Environmental Protection Agency/Headquarters
- ER - Environmental Restoration
- RCRA - Resource Conservation and Recovery Act
- RI/FS - Remedial Investigation/Feasibility Study
- ROD - Record of Decision

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Suzanne Clarke	Dames & Moore	376-8181
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**ENVIRONMENTAL RESTORATION - STORAGE AND DISPOSAL FACILITY
(ERSDF) MEETING MINUTES**

Distribution List:

Jay Augustenborg - DOE-RL/WMD
Suzanne Clarke - Dames & Moore
Michael Collins - DOE-RL/PMD
Audree DeAngeles - PRC
Vern Dronen - WHC
Julie Erickson - DOE-RL/ERD
Carrie Sikorski/Cathy Massimino - EPA Region 10
Bryan Foley - DOE-RL/ERD
Jim Goodenough - DOE-RL/ERD
Toby Michelena/Richard Hibbard - Ecology, Lacey
George Hofer - EPA Region 10
Dave Nylander/Moses Jaraysi - Ecology, Kennewick
Merl Lauterbach - WHC
Ann Price/Dave Fagan - EPA Headquarters
Fred Roeck - WHC
Ward Staubitz - USGS
Darci Teel/Ted Wooley - Ecology, Kennewick
EPA ERSDF File

Administrative Record v ER Storage and Disposal Facility (ERSDF)

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